



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 19, 2019

BY ECF

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 12/19/19

Re: United States v. Henry Perez, 19 Cr. 880 (RMB)

Dear Judge Berman:

At the initial conference before Your Honor on December 18, 2019, the Government requested five changes to defendant Henry Perez's bail conditions. The Court directed the Government to submit a letter by today at noon and the defense to submit a letter by tomorrow at noon. The Government respectfully requests until tomorrow to submit its letter, and requests that the defense receive an extra business day for its letter, as well (*i.e.*, a Friday deadline for the Government, and a Monday deadline for the defense). In the process of drafting the Government's letter, issues have arisen—including regarding sensitive, potentially proprietary information—which require conversations with the corporate victim of this crime. Unfortunately, counsel for the Government is traveling by plane today. The Government respectfully submits that the modest delay requested—one business day—is warranted. Importantly, there is no prejudice to the defendant, who was released on bail on the same day as his arrest (December 17, 2019). As the Court is aware from the Government's bail appeal, the Government is eager to strengthen the bail conditions, but wants to ensure that such an application is made with full protections for victims, individual and corporate alike. This is the first request for an adjournment, and the defense consents to this request. The Court's consideration of this request is greatly appreciated.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

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Application granted.	
cc:	All counsel of record (by ECF)
	Pretrial Services Officer Dayshawn Bostic (by email)
SO ORDERED:	<u>Richard M. Berman</u>
Date: 12/19/19	Richard M. Berman, U.S.D.J.